

Presentment Date and Time: August 7, 2020 at 12:00 p.m. (prevailing Eastern Time)
Objection Deadline: August 3, 2020 at 11:30 a.m. (prevailing Eastern Time)
Hearing Date and Time (only if Objections Filed): To Be Announced

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*Attorneys for Debtors
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.¹

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed

**NOTICE OF PRESENTMENT ON FIFTH MOTION FOR ORDERS
ESTABLISHING STREAMLINED PROCEDURES GOVERNING ADVERSARY
PROCEEDINGS BROUGHT BY THE DEBTORS PURSUANT TO SECTIONS 502,
547, 548 AND 550 OF THE BANKRUPTCY CODE**

PLEASE TAKE NOTICE that the Debtors will present the *Fifth Motion for Orders Establishing Streamlined Procedures Governing Adversary Proceedings Brought by the Debtors Pursuant to Sections 502, 547, 548 and 550 of The Bankruptcy Code* (the “**Motion**”) to the Honorable Robert D. Drain, United States Bankruptcy Judge, for signature on **August 7, 2020 at 12:00 p.m. (Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that responses or oppositions, if any, to the relief requested in the Motion, must be in writing, must comply with the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, must describe the basis for the response or opposition and the specific grounds therefor, and must be filed with the Bankruptcy Court electronically and served, so as to be actually received no later than **August 3, 2020 at 11:30 a.m. (prevailing Eastern Time)** (the “Opposition Deadline”), on (a) counsel to the Debtors, ASK LLP, 2600 Eagan Woods Drive, Suite 400, St. Paul, Minnesota (Attn: Brigitte McGrath, Esq.), Katten Muchin Rosenman LLP 575 Madison Avenue, New York, New York

Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors’ corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

10022 (Attn: Steven J. Reisman) and (b) the Office of the United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006, New York, New York 10014. A courtesy copy of such written response or objection must also be delivered to the Bankruptcy Judge's chambers prior to the hearing on the Motion.

PLEASE TAKE FURTHER NOTICE that unless an objection is served and filed with proof of service with the Clerk of the Court, and a courtesy copy is delivered to the undersigned and to the chambers of the Honorable Robert D. Drain, so as to be received by **August 3, 2020 at 11:30 a.m. (prevailing Eastern Time)**, there will not be a hearing to consider the relief requested in the Motion, and an order may be signed and entered by the Court.

PLEASE TAKE FURTHER NOTICE that if an objection is timely filed and served with respect to the Motion, a hearing (the "**Hearing**") will be held to consider such objection before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court, 300 Quarropas Street, White Plains, New York 10601.)

PLEASE TAKE FURTHER NOTICE that any objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted upon default.

Dated: July 17, 2020

ASK LLP

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